

1 STEPHANIE M. HINDS (CABN 154284)  
United States Attorney

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3 Chief, Criminal Division

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Oakland, California 94612  
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9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 MICHAEL RICHARD LYNCH and  
17 STEPHEN KEITH CHAMBERLAIN,

18 Defendants.

) Case No. CR 18-577 CRB

) **THE UNITED STATES' UNOPPOSED  
MOTION TO MODIFY RULE 17 SUBPOENAS**

19 For the reasons set forth below, the United States hereby moves to modify the Rule 17 subpoenas  
20 issued by the Court on June 8, 2022. On that date, the Court issued seven (7) Rule 17 Subpoenas to  
21 Testify and Produce Documents or Objects in a Criminal Case. Document 122. Three of the persons to  
22 whom the Rule 17 subpoenas were issued -- Gary Szukalski, Rob Sass, and Nicole Eagan – reside in the  
23 United States and have been served with the Rule 17 subpoenas (the “Subpoena Recipients”). The  
24 Subpoena Recipients have each retained counsel.

25 The language of the original Rule 17 subpoenas requested the following documents: “Please  
26 produce all documents relating in any way to Count Seventeen (pages 13-15) of the attached

28 THE UNITED STATES' UNOPPOSED MOTION TO MODIFY RULE 17 SUBPOENAS  
CASE NO. CR 18-577 CRB

1 Superseding Indictment in *United States v. Lynch and Chamberlain*, Case No. 18-CR-577 CRB,  
 2 including all such documents that reference Michael Lynch, Steven Chamberlain, Autonomy, Hewlett  
 3 Packard (“HP”), Invoke Capital, Darktrace, possible employment, and any other possible benefits.”  
 4 Document 122 at 34.

5 In good faith, counsel for the Subpoena Recipients conferred with government counsel about  
 6 certain issues relating to the language of the original subpoenas. For example, counsel for the Subpoena  
 7 Recipients asked whether compliance with the subpoenas required a legal interpretation of the  
 8 allegations in the underlying indictment.

9 Thereafter, counsel for the Subpoena Recipients and counsel for the government conferred about  
 10 modifying the language of the document request in the Rule 17 subpoenas to address these issues.  
 11 Modification of the language of the subpoenas may obviate the need for litigation around the  
 12 interpretation and obligations of the original subpoenas.

13 Counsel for the government and the Subpoena Recipients settled on the modified language set  
 14 forth in the attached seven (7) Rule 17 subpoenas. These modified subpoenas would be issued to the  
 15 same seven (7) persons to whom the original Rule 17 subpoenas were issued but, if ordered by the  
 16 Court, would utilize the modified document request language to which both government counsel and the  
 17 counsel for the Subpoena Recipients have agreed.

18 Counsel for the government has conferred about this motion with counsel for defendant Stephan  
 19 Chamberlain. Defendant Chamberlain does not oppose this motion.

20 For these reasons, the United States respectfully requests that the Court issue the seven (7) Rule  
 21 17 subpoenas in the form attached hereto.

22  
 23 DATED: February 17, 2023

Respectfully submitted,

24  
 25 STEPHANIE M. HINDS  
 United States Attorney

26  
 27 /s/ Adam A. Reeves

28  
 29 ADAM A. REEVES  
 Assistant United States Attorney

THE UNITED STATES’ UNOPPOSED MOTION TO MODIFY RULE 17 SUBPOENAS  
 CASE NO. CR 18-577 CRB

# Rule 17 Subpoena

## Rob Sass

## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

TO: Rob Sass

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE				COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612		17th Fl. Courtroom 6
				DATE AND TIME 4/7/2023 09:00

You are also commanded to bring with you the following document(s) or object(s):

PLEASE SEE ATTACHMENT A

NOTE: Subpoena forms for the production of documents or objects at or in advance of the trial, hearing or proceeding at which the items are to be offered in evidence (CAND 89B, *Subpoena to Produce Documents or Objects in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's Internet site: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

(By) Deputy Clerk



DATE

02/17/2023

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney  
U.S. Attorney's Office  
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

*Adam A. Reeves*

Tel. (415) 436-7200

This subpoena is issued on application  
of the United States of America

Stephanie M. Hinds  
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on _____	DATE	SIGNATURE OF SERVER
ADDRESS:		
ADDITIONAL INFORMATION		

ATTACHMENT A

For the period October 2011 to November 30, 2018, please produce any and all non-privileged documents relating in any way to the following:

1. The actual or possible employment, hiring, or retention (including any agreement for work in exchange for money) of the subpoena recipient by any entity or person controlled by or affiliated at any time with Michael Lynch;
2. Gifts, payments, or any other benefit provided by Michael Lynch, or entities or persons controlled by or affiliated at any time with him, to the subpoena recipient; provided, however, that this request does not include ordinary-course expense reimbursements or regular employment benefits (such as salary and insurance);
3. Any Hewlett-Packard Company (HP) documents that were: (a) taken by any person without authority or HP's permission, or otherwise misappropriated by any person from HP, or (b) retained or received by the subpoena recipient after leaving HP's employment;
4. The falsification, alteration, destruction, mutilation, or concealment of any documents relating to Autonomy or HP;
5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.

Rule 17 Subpoena  
Poppy Prentiss  
(aka Poppy Gustafsson)

## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

TO: Poppy Prentiss (aka Poppy Gustafsson)

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

(By) Deputy Clerk



DATE

02/17/2023

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney  
U.S. Attorney's Office  
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

*Adam A. Reeves*

Tel. (415) 436-7200

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Stephanie M. Hinds  
United States Attorney

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SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
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2. Gifts, payments, or any other benefit provided by Michael Lynch, or entities or persons controlled by or affiliated at any time with him, to the subpoena recipient; provided, however, that this request does not include ordinary-course expense reimbursements or regular employment benefits (such as salary and insurance);
3. Any Hewlett-Packard Company (HP) documents that were: (a) taken by any person without authority or HP's permission, or otherwise misappropriated by any person from HP, or (b) retained or received by the subpoena recipient after leaving HP's employment;
4. The falsification, alteration, destruction, mutilation, or concealment of any documents relating to Autonomy or HP;
5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.

# Rule 17 Subpoena

## Peter Menell

## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

TO: Peter Menell

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE				COURTROOM/JUDGE
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				DATE AND TIME 4/7/2023 09:00

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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

(By) Deputy Clerk



DATE

02/17/2023

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney  
U.S. Attorney's Office  
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

*Adam A. Reeves*

Tel. (415) 436-7200

This subpoena is issued on application  
of the United States of America

Stephanie M. Hinds  
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
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2. Gifts, payments, or any other benefit provided by Michael Lynch, or entities or persons controlled by or affiliated at any time with him, to the subpoena recipient; provided, however, that this request does not include ordinary-course expense reimbursements or regular employment benefits (such as salary and insurance);
3. Any Hewlett-Packard Company (HP) documents that were: (a) taken by any person without authority or HP's permission, or otherwise misappropriated by any person from HP, or (b) retained or received by the subpoena recipient after leaving HP's employment;
4. The falsification, alteration, destruction, mutilation, or concealment of any documents relating to Autonomy or HP;
5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.

# Rule 17 Subpoena

## Nicole Eagan

## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

TO: Nicole Eagan

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE				COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612		17th Fl. Courtroom 6
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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

(By) Deputy Clerk



DATE

02/17/2023

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney  
U.S. Attorney's Office  
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

*Adam A. Reeves*

Tel. (415) 436-7200

This subpoena is issued on application  
of the United States of America

Stephanie M. Hinds  
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
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SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$	
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DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
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4. The falsification, alteration, destruction, mutilation, or concealment of any documents relating to Autonomy or HP;
5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.

# Rule 17 Subpoena

## Lisa Harris

## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

TO: Lisa Harris

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE				COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612		17th Fl. Courtroom 6
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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

(By) Deputy Clerk



DATE

02/17/2023

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney  
U.S. Attorney's Office  
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

*Adam A. Reeves*

Tel. (415) 436-7200

This subpoena is issued on application  
of the United States of America

Stephanie M. Hinds  
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
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3. Any Hewlett-Packard Company (HP) documents that were: (a) taken by any person without authority or HP's permission, or otherwise misappropriated by any person from HP, or (b) retained or received by the subpoena recipient after leaving HP's employment;
4. The falsification, alteration, destruction, mutilation, or concealment of any documents relating to Autonomy or HP;
5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.

# Rule 17 Subpoena

## Gary Szukalski

## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

TO: Gary Szukalski

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

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02/17/2023

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

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CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

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6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.

# Rule 17 Subpoena Corrado Broli

## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

SUBPOENA TO PRODUCE  
DOCUMENTS OR OBJECTS  
IN A CRIMINAL CASE

Plaintiff,

Case No.: 3:18-cr-577-CRB

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

TO: Corrado Broli

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE				COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612		17th Fl. Courtroom 6
				DATE AND TIME 4/7/2023 09:00

You are also commanded to bring with you the following document(s) or object(s):

PLEASE SEE ATTACHMENT A

NOTE: Subpoena forms for the production of documents or objects at or in advance of the trial, hearing or proceeding at which the items are to be offered in evidence (CAND 89B, *Subpoena to Produce Documents or Objects in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's Internet site: [cand.uscourts.gov](http://cand.uscourts.gov).

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

(By) Deputy Clerk



DATE

02/17/2023

ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney  
U.S. Attorney's Office  
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

*Adam A. Reeves*

Tel. (415) 436-7200

This subpoena is issued on application  
of the United States of America

Stephanie M. Hinds  
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$	
SERVED BY (PRINT NAME)	TITLE	
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on _____	DATE	SIGNATURE OF SERVER
		ADDRESS:
ADDITIONAL INFORMATION		

ATTACHMENT A

For the period October 2011 to November 30, 2018, please produce any and all non-privileged documents relating in any way to the following:

1. The actual or possible employment, hiring, or retention (including any agreement for work in exchange for money) of the subpoena recipient by any entity or person controlled by or affiliated at any time with Michael Lynch;
2. Gifts, payments, or any other benefit provided by Michael Lynch, or entities or persons controlled by or affiliated at any time with him, to the subpoena recipient; provided, however, that this request does not include ordinary-course expense reimbursements or regular employment benefits (such as salary and insurance);
3. Any Hewlett-Packard Company (HP) documents that were: (a) taken by any person without authority or HP's permission, or otherwise misappropriated by any person from HP, or (b) retained or received by the subpoena recipient after leaving HP's employment;
4. The falsification, alteration, destruction, mutilation, or concealment of any documents relating to Autonomy or HP;
5. The substance, content, or wording of any statement or testimony relating in any way to Autonomy or HP, including, but not limited to, any statement to be made during HP's internal investigation; any statement to be made in connection with the U.K. civil case; any statement to be made to the grand jury, the U.S. Department of Justice, or any other investigative agency in the United States; or any statement to be made in any possible trial or other legal proceeding in the United States.
6. The concealment or transfer to untraceable or numerical accounts of any money or funds associated with the sale of Autonomy securities in 2011.